

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICROSOFT CORPORATION,  
Plaintiff,

vs.

MOTOROLA, INC., et al.,  
Defendants.

MOTOROLA MOBILITY, INC., et al.,  
Plaintiffs,

vs.

MICROSOFT CORPORATION,  
Defendants.

Case No. C10-1823-JLR

**DECLARATION OF CHRISTOPHER  
WION IN SUPPORT OF  
MICROSOFT CORPORATION'S  
RULE 702 MOTION TO PRECLUDE  
TESTIMONY BY CHARLES R.  
DONOHUE AND DR. R. SUKUMAR**

**Noted: Monday, September 10, 2012**

**ORAL ARGUMENT REQUESTED**

I, Christopher Wion, hereby declare as follows:

1. I am an attorney at the law firm of Calfo Harrigan Leyh & Eakes LLP, one of the law firms representing Microsoft in the above-captioned matter, and have personal knowledge of the facts stated herein.

**DECLARATION OF CHRISTOPHER WION  
IN SUPPORT OF MICROSOFT'S RULE 702  
MOTION - 1**

LAW OFFICES  
CALFO HARRIGAN LEYH & EAKES LLP  
999 THIRD AVENUE, SUITE 4400  
SEATTLE, WASHINGTON 98104  
TEL. (206) 623-1700 FAX, (206) 623-8717

2. Attached hereto as Exhibit 1 (and filed Under Seal) is a true and correct copy of the transcript from the August 22, 2012 deposition of Richard Schmalensee, taken in the above-captioned case.

3. Attached hereto as Exhibit 2 (and filed Under Seal) is a true and correct copy of the July 24, 2012 opening expert report of Charles R. Donohoe, submitted in the above-captioned case.

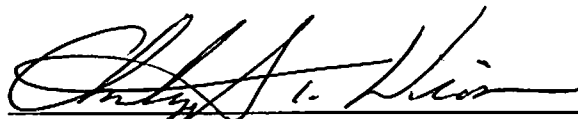
4. Attached hereto as Exhibit 3 (and filed Under Seal) is a true and correct copy of the transcript from the August 24, 2012 deposition of Charles R. Donohoe, taken in the above-captioned case.

5. Attached hereto as Exhibit 4 is a true and correct copy of the July 24, 2012 opening expert report of Dr. R. Sukumar, submitted in the above-captioned case.

6. Attached hereto as Exhibit 5 (and filed Under Seal) are true and correct excerpts from the August 21, 2012 deposition of Timothy Drabik, taken in the above-captioned case.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 27<sup>th</sup> day of August, 2012 in Seattle, Washington.

  
CHRISTOPHER WION

**CERTIFICATE OF SERVICE**

I, Linda Bledsoe, swear under penalty of perjury under the laws of the State of Washington to the following:

1. I am over the age of 21 and not a party to this action.
2. On the 27<sup>th</sup> day of August, 2012, I caused the preceding document to be served on counsel of record in the following manner:

**Attorneys for Motorola Solutions, Inc., and Motorola Mobility, Inc.:**

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**DECLARATION OF CHRISTOPHER WION  
IN SUPPORT OF MICROSOFT'S RULE 702  
MOTION - 3**

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8 DATED this 27<sup>th</sup> day of August, 2012.

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LINDA BLEDSOE

DECLARATION OF CHRISTOPHER WION  
IN SUPPORT OF MICROSOFT'S RULE 702  
MOTION - 4

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